



Susan L. Prior
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Corporate Compliance

March 27, 2003

Rebecca Kane
Environmental Protection Agency
Office of Enforcement and Compliance Assurance
MC 2222A
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Enforcement and Compliance History Online [ECHO]

Dear Ms. Kane;

Clean Harbors Environmental Services, Inc. (Clean Harbors), headquartered in Braintree, Massachusetts, is a publicly traded company whose 4,500 employees provide a wide range of environmental remediation services, hazardous waste management and on-site lab-packing to a diversified customer base from over 100 locations in North America. Clean Harbors provides a broad range of industrial maintenance and hazardous waste management capabilities, including treatment, storage, resource recovery, soil stabilization, and the transportation and disposal of industrial wastes and hazardous materials. Over the past 22 years, Clean Harbors has grown to become the nation's largest provider of environmental services.

As a leader in the hazardous waste industry, Clean Harbors is directly affected by the new ECHO database that was made available to the public on November 20, 2002 via the Internet. We would have appreciated the opportunity to correct the data in the ECHO database prior to the data going live on November 20th. It is unfortunate that our current and perspective clients had access to information regarding violations that in some cases was not correct. This type of inaccurate information causes confusion for our clients, and mistrust that could result in loss of future business opportunities for Clean Harbors. It would be prudent going forward for the regulated community to have the opportunity to review and correct data prior to the data being posted on the website. This could be done with a simple e-mail notification.

We are submitting the following comments as requested in the November 20, 2002 *Notice of information availability and request for comments*.

Question A. Were your facility reports accurate?

Approximately half of our facilities had correct data and the other half needed corrections. Data problems include the following:

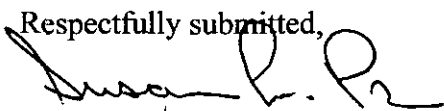
- Sometimes data was mixed up between facilities, meaning that the data for one facility would be listed under a different facility in the same state;
- In many cases, violations older than two years were recorded under Quarter 1, "01 in the RCRA 2 year Compliance Status section". Some of these violations were dated in the early 1990's;
- For several facilities, in the RCRA 2 year Compliance Status section, arrows were used in the boxes such as >>>> with no explanation in the key as to what this notation meant;
- Some facilities were listed several times under one EPA number with a variety of facility names, each one slightly different. This is very confusing when trying to look at summary data; and
- In some cases, violations that have already been resolved with the agencies showed as being out of compliance for an extended period of time.

Question B. If you did need to submit an online error report, was the error reporting process easy to use.

Reports from our facilities indicate that the correction process was easy to use and the EPA and State agencies were prompt in responding and correcting the problems.

Thank you for the opportunity to comment on this new process. If you have any questions regarding these comments, please contact me at 603-437-1533.

Respectfully submitted,



Susan Prior
Regulatory Analyst

cc: Scott Kuhn – Vice President of Environmental Compliance, Clean Harbors